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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Bankruptcy Case No. 19-30088 (DM)

**PG&E CORPORATION,**

Chapter 11

**- and -**

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**REORGANIZED DEBTORS' REPORT  
ON RESPONSES TO EIGHTH  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (NO BASIS FOR CLAIM –  
FAILURE TO PROVIDE ANY  
TRADING INFORMATION) AND  
REQUEST FOR ORDER BY DEFAULT  
AS TO UNOPPOSED OBJECTIONS**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

**[Re: Dkt. No. 10922]**

**Resolving Objections Set for Hearing  
August 25, 2021 at 10:00 a.m. (Pacific  
Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-  
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of  
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that  
8 the Court enter an order by default on the *Reorganized Debtors’ Eighth Securities Claims Omnibus*  
9 *Objection (No Basis for Claim – Failure to Provide Any Trading Information)* [Docket No. 10922] (the  
10 “**Eighth Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE EIGHTH SECURITIES CLAIMS OMNIBUS OBJECTION**

12 The Eighth Securities Claims Omnibus Objection seeks to disallow and expunge the proofs of  
13 claim that were filed by PG&E security holders who have failed to provide any trade-level securities  
14 data and thus these proofs of claim lack any basis to assert liability against the Reorganized Debtors.  
15 These claims are listed in Exhibit 1 to the Eighth Securities Claims Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Eighth Securities*  
18 *Claims Omnibus Objection (No Basis for Claim – Failure to Provide Any Trading Information)* [Docket  
19 No. 10924] (the “**Notice of Hearing**”). The Eighth Securities Claims Omnibus Objection was also  
20 supported by the *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors’ Eighth*  
21 *Securities Claims Omnibus Objection (No Basis for Claim – Failure to Provide Any Trading*  
22 *Information)* [Docket No. 10923] (the “**Declaration**”). The Eighth Securities Claims Omnibus  
23 Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of*  
24 *Service* of Liliya Kulyk, filed on July 19, 2021 [Docket No. 10952] (the “**Certificate of Service**”). As  
25 further described in the Certificate of Service, on July 14, 2021, each holder of a claim listed on Exhibit 1  
26 to the Eighth Securities Claims Omnibus Objection received a notice including the claim number, debtor,  
27 claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the  
28 applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Eighth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim No.	Resolution
Informal	Carole Fell	103714	The Reorganized Debtors have removed this claim from Exhibit A to this Request and will withdraw the objection to this claim without prejudice.
11038	Michael Dewan Dennis Madden	103767	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the October 19, 2021, Omnibus Hearing.
Informal	Erik & Rose Von Buchau	105784	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the October 19, 2021, Omnibus Hearing.
Informal	Iowa Health System-Board Designated	99590	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Ford Motor Company Defined Benefit Master Trust	99623	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Iowa Health System-Insurance	99677	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Iowa Health Systems Pension Fund – Central Iowa Health System	99685	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Metropolitan Life Insurance Company	99777	The Reorganized Debtors are working to consensually resolve this objection and

Docket No.	Claimant	Claim No.	Resolution
			have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	LIQ-Sheet Metal Workers' Local Union No. 80 Pension	99971	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Metwest Conservative Unconstrained Bond Fund (Cayman)	100014	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Lockheed Martin Corporation Master Retirement Trust	100085	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	SEI CIT – TCW Long Duration Gov't/Credit Fund	100333	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	Uniform Retirement System for Judges and Justices	100447	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	SIIT Long Duration Credit Fund	100484	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	SEI CIT – TCW Long Duration Credit Fund	100506	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.

Docket No.	Claimant	Claim No.	Resolution
Informal	SDG&E Qualified Nuclear Decommissioning Trust Partnership	100511	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	San Diego City Employees' Retirement System	100573	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	USD-Unhedged Metwest Conservative Unconstrained Bond Fund	100625	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	TCW US Credit Gold BM Fund	100700	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.
Informal	TCW US Credit Gold Fund	100859	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the September 29, 2021, Omnibus Hearing.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am a partner with the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for the Reorganized Debtors.
- The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Eighth Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in

**Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Eighth Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated August 18, 2021

**WEIL, GOTSHAL & MANGES LLP**

**KELLER BENVENUTTI KIM LLP**

By: /s/ Richard W. Slack

Richard W. Slack

*Attorneys for Debtors and Reorganized Debtors*